

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Stephen Bernard Hill Jr.

Case: 2:23-mj-30280

Assigned To : Unassigned

Assign. Date : 7/5/2023

CMP: SEALED MATTER (MAW)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 19, 2022 - December 24, 2022 in the county of Wayne and elsewhere in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*

18 U.S.C. § 922(a)(6)

18 U.S.C. § 922(j)

18 U.S.C. § 1343

*Offense Description*

Making a false statement during the purchase of a firearm

Possession of a stolen firearm

Wire fraud

This criminal complaint is based on these facts:

see attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
 and/or by reliable electronic means.

Date: July 5, 2023


City and state: Detroit, Michigan



Complainant's signature

Kara M. Klupacs, Special Agent (ATF)

Printed name and title



Judge's signature

Hon. Anthony P. Patti, United States Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A  
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Kara M. Klupacs, being duly sworn, hereby depose and state the following:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), and have been so employed since March 2018. I am currently assigned to the Detroit Field Division Group 2. I graduated from the Federal Law Enforcement Training Center and ATF Special Agent Basic Training. Prior to becoming a Special Agent, I served eight years as a federal law enforcement officer with U.S. Customs and Border Protection Officer and the U.S. Secret Service Uniformed Division. During my employment with ATF, I have conducted and/or participated in dozens of criminal investigations involving the possession, use, and trafficking of firearms, among other state and federal offenses.

2. I based this affidavit on my personal knowledge, interviews conducted by myself and/or other law enforcement agents, communications with others who had personal knowledge of the events and circumstances described herein, and information gained through my training and experience. The information outlined below is for the limited purpose of establishing probable cause and does not contain all facts known to law enforcement regarding this investigation.

3. Probable cause exists that Stephen Bernard HILL Jr. (B/M, DOB: XX/XX/2001) fraudulently purchased and made false statements during the purchase of one FN model 509, 9x19mm, caliber semiautomatic pistol bearing serial number GKS0319395, one Sig Sauer model P365 9x19mm caliber semiautomatic pistol bearing serial number 66F427158, one Smith and Wesson model M&P 15, Sport II, 5.56 NATO caliber, semiautomatic rifle bearing serial number TV95112, and one Smith and Wesson model M&P 15-22, .22LR caliber semiautomatic rifle bearing serial number LBH0056, in violation of 18 U.S.C. § 922(a)(6) (making a false statement during the purchase of a firearm), 18 U.S.C. § 922(j) (possession of a stolen firearm), and 18 U.S.C. § 1343 (wire fraud).

#### **PROBABLE CAUSE**

4. On February 13, 2023, I was advised that Range USA, a Federal Firearm Licensee (FFL) with multiple locations in the Eastern District of Michigan, had received multiple chargebacks on firearms purchased by Stephen Bernard HILL Jr. (B/M, DOB: XX/XX/2001) and Keimonie Davievonne-Lee TUCKER (B/M, DOB: XX/XX/2001). As a result of this investigation, I have learned that TUCKER and HILL, on multiple occasions in December of 2022, utilized credit cards bearing different card holder names and addresses to fraudulently purchase 12 firearms, 45 boxes of ammunition, and other firearms accessories from Range USA. Range USA provided copies of the online purchase orders, receipts, ATF Form 4473s, and

surveillance footage of the firearms transactions completed by HILL and TUCKER. To date, 9 of the 12 purchased firearms, 30 of the 45 purchased boxes of ammunition, and multiple other firearms accessories have been charged back to the FFL. I reviewed the purchase orders and firearms transaction records completed by Stephen HILL. Two of his fraudulent transactions are detailed below.

**Fraudulent Purchase #1 – Range USA Order No. 1210258**

5. On December 19, 2022, purchaser “Stephen Hill” ordered online one FN model 509 pistol and one Sig Sauer P365 pistol from Range USA’s website. During the online order, purchaser “Stephen Hill” provided 4X3 Overbay Drive, Petoskey, Michigan as the billing and shipping address. Purchaser “Stephen Hill” paid for the order using a Mastercard credit card ending in 6681 and providing the cardholder’s name “CM.”

6. On December 22, 2022, HILL arrived in person at the Range USA in Wixom, MI. During my review of Range USA’s surveillance footage, I observed HILL complete the ATF Form 4473 and take possession of one FN model 509 9x19mm caliber semiautomatic pistol bearing serial number GKS0319395 and one Sig Sauer model P365 9x19mm caliber semiautomatic pistol bearing serial number 66F427158. On the ATF Form 4473, HILL listed 11XXX Asbury Park, Detroit, Michigan as his address. This address was different from the previously provided billing address.

7. The Law Enforcement Information Network (LEIN) and the law enforcement database Accurint indicate that HILL is not associated with the billing residence.

8. This purchase, totaling \$1,695.98, was later charged back to the FFL.

9. As a result of this investigation, law enforcement obtained and searched HILL's phone pursuant to a federal search warrant. On June 16, 2023, I completed a partial review of HILL's phone and observed HILL, TUCKER, and others engage in conversations regarding firearms and fraud. Specifically, on December 19, 2022, at approximately 11:53 p.m., HILL texted the group chat a screenshot of an order confirmation for the purchase of one Sig Sauer model P365 and one FN model 509 totaling \$1,695.98. This order information is consistent with Range USA Order No. 1210258, which was completed by HILL and later charged back to Range USA.

**Fraudulent Purchase #2 – Range USA Order No. 1221606**

10. On December 23, 2022, purchaser "Stephen Hill" ordered online one Smith and Wesson model M&P 15-22 rifle, one Smith and Wesson M&P 15 Sport II rifle, and various other firearms accessories from Range USA's website. During the online order, purchaser "Stephen Hill" again provided 4X3 Overbay Drive, Petoskey, Michigan as the billing and shipping address. This order was paid for utilizing a Mastercard credit card ending in 6681 and listing cardholder name "CM."

11. On December 24, 2022, HILL arrived in person at the Range USA in Wixom, Michigan. During my review of Range USA's surveillance footage, I observed HILL complete the ATF Form 4473 and take possession of one Smith and Wesson model M&P 15-22, .22LR caliber semiautomatic rifle bearing serial number LBH0056, one Smith and Wesson model M&P 15 Sport II, 5.56 NATO caliber semiautomatic rifle bearing serial number TV95112, and various other firearms-related items. On the ATF Form 4473, HILL listed 11XXX Asbury Park, Detroit, Michigan as his address. This address was different from the previously provided billing address.

12. LEIN and Accurant indicate that HILL is not associated with the billing residence.

13. This purchase, totaling \$1,865.50, was later charged back to the FFL.

14. While conducting a partial review of HILL's phone, I observed that HILL texted in a group chat, on December 23, 2022, three Range USA links for different firearms, including the Smith and Wesson M&P15 Sport II rifle. He asked "Which one should I get?" HILL then texted another Range USA link for a Smith and Wesson MP15-22, AR-15 pistol, and stated "Like the one y'all like the most." An individual saved into HILL's contacts as "XXXXXXX" responded by texting the group chat "Bet" and "Loved" the Range USA link for the Smith and Wesson MP15-22 pistol. TUCKER replied under the link for the Smith and Wesson model M&P15

Sport II AR-15 rifle and stated “That mf right there.” HILL replied “I’mma get both of them.” Later that day, HILL texted the group chat a screenshot of a Range USA order confirmation. HILL then texted that he has used the same card, has spent almost \$3,200.00 with it, and assumed that the cardholder must have a high credit card balance. Specifically, HILL texted “Same piece tho , almost \$3200 of the same one!! They credit card balance high asf.”

15. I observed that the information discussed by HILL in the group chat is consistent with Order No. 1221606, which was later charged back to Range USA.

#### **Contact with Victim CM**

16. During a review of the notes section stored on HILL’s phone, I observed a saved subfolder titled “Punches.” Based on my training and experience, I know that a “punch” can refer to fraudulently acquired credit card or identity information. I observed the “Punches” folder to contain the Personal Identification Information (PII) of numerous individuals, including the 16-digit card number, CVV, expiration date, and billing address of the credit card belonging to “CM”, previously provided for payment during Range USA Order 1210258 and Order 1221606.

17. On May 8, 2023, I interviewed “CM.” “CM” confirmed they had previously had fraud issues with their card but had since taken care of it. “CM” advised they did not know a HILL or a TUCKER, nor had they authorized them to

use their card. “CM” advised they had not purchased any firearms with their card, nor had they authorized others to purchase firearms with their card.

18. I reviewed the ATF Form 4473s completed by HILL for the above-described firearms transactions. The ATF Form 4473 asks the purchaser of a firearm the following question: *“Are you the actual transferee/buyer of the firearm(s) listed on this form? Warning: You are not the actual transferee/buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual transferee/buyer, the licensee cannot transfer the firearm(s) to you.”* I reviewed the forms and observed that HILL marked “Yes.” I also observed on the forms that HILL signed his name certifying his answers are true, correct, and complete. Additionally, HILL signed his name where it states, *“I also understand that making any false oral or written statement, or exhibiting any false or misrepresented identification with respect to this transaction, is a crime punishable as a felony under federal law, and may also violate state and/or local laws.”*

19. On the ATF Form 4473s, I reviewed the information detailing the firearms purchased by HILL. As an ATF Firearm Interstate Nexus agent, it is my opinion that the FN model 509, 9x19mm, caliber semiautomatic pistol bearing serial number GKS0319395, the Sig Sauer model P365 9x19mm caliber semiautomatic pistol bearing serial number 66F427158, the Smith and Wesson model M&P 15 Sport II, 5.56 NATO caliber, semiautomatic rifle bearing serial number TV95112,



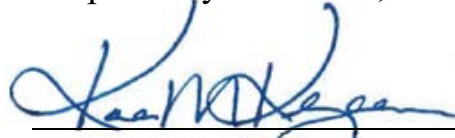
and the Smith and Wesson model M&P 15-22, .22LR caliber semiautomatic rifle bearing serial number LBH0056 were manufactured outside of the state of Michigan and therefore have traveled in interstate or foreign commerce.

### **CONCLUSION**

20. Based on the above, probable cause exists that on December 19, 2022 and December 23, 2022, HILL, without authorization, used a Mastercard card number ending in 6681 to fraudulently purchase online one FN model 509, 9x19mm, caliber semiautomatic pistol bearing serial number GKS0319395, one Sig Sauer model P365 9x19mm caliber semiautomatic pistol bearing serial number 66F427158, one Smith and Wesson model M&P 15, Sport II, 5.56 NATO caliber, semiautomatic rifle bearing serial number TV95112, and one Smith and Wesson model M&P 15-22, .22LR caliber semiautomatic rifle bearing serial number LBH0056, in violation of 18 U.S.C. § 1343. Subsequently, on December 22, 2022, and December 24, 2022, HILL made false statements on the ATF Form 4473 by certifying himself as the true purchaser of the firearms while also having reasonable cause to believe the firearms would be considered stolen, in violation 18 U.S.C. § 922(a)(6) and 18 U.S.C. § 922(j).

21. The above violations occurred within the Eastern Judicial District of Michigan.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Kara M. Klupacs", written over a horizontal line.

Kara M. Klupacs, Special Agent  
Bureau of Alcohol, Tobacco,  
Firearms and Explosives

Sworn to and subscribed before me  
and/or by reliable electronic means.

A handwritten signature in blue ink, appearing to read "Hon. Anthony P. Patti", written over a horizontal line.

HON. ANTHONY P. PATTI  
UNITED STATES MAGISTRATE JUDGE

Date: July 5, 2023